EXCEPTIONS GUIDELINE **PERFORMANCE** 1) Events Requiring Investigation 1) Events Requiring Investigation 1) Events Requiring a) Criteria for when to perform an investigation are given in OPM 10.1, a) Establish criteria for when to perform an Investigation "Occurrence Reporting and Processing of Significant Operations investigation None Information", OPM 9.4.5, "C-A Accident/Incident Investigation," and SBMS Subject Areas Occurrence Categorizer's Procedure and Investigation of Incidents, Accidents and Injuries. An on-duty ORPs Categorizer is available at all times by calling 631-433-0443. Specific events requiring investigation at the C-AD are defined in the List specific events requiring investigation Subject Area and the ORPs Categorizer's Procedure. Categorizers are trained to assist managers in determining the need to classify and criteria used. Events requiring investigation in accordance with DOE Orders are identified in SBMS Subject Areas Occurrence Categorizer's Procedure and Investigation of Incidents, Accidents and Injuries. Criteria for a near miss are given in OPM 10.1 and in the Occurrence Establish criteria for a "near miss" situation Categorizer's Procedure administered by the Quality Management Office. The following events require investigation: OPM 10.1, OPM 9.4.5 and the Occurrence Categorizer's Procedure Violation of design limits establishes the following as events requiring investigation: i) i) Violation of design limits Unusual, abnormal, or unexplained ii) performance or safety conditions ii) Unusual, abnormal or unexplained performance or safety conditions Improper positioning of safety iii) system features iii) Improper positioning of safety system features Unexplained shutdown iv) iv) Unexplained shutdown Violation of a procedure or human v) error which could have serious v) Violation of a procedure or human error which could have serious implications implications Failure of equipment with safety vi) vi) Failure of equipment with safety implications implications Exceeding radiological or toxic vii) vii) Exceeding radiological or toxic substance limits substance limits Actual or attempted sabotage viii)

DATE: 6/08/06 **PAGE:** 1 of 5

GUIDELINE	PERFORMANCE	EXCEPTIONS
 ix) Review committee deems an investigation is necessary x) Loss of Special Nuclear Material xi) Occurrence of repetitive problem 	viii)Actual or attempted sabotage ix) Whenever a review committee deems an investigation is necessary x) Loss of Special Nuclear Material	
Investigation Responsibility a) Manager has ultimate responsibility for consistency and thoroughness of event investigation	xi) Occurrence of repetitive problem 2) Investigation Responsibility a) The C-AD Department Chairman is named the C-AD Facility Manager and has the ultimate responsibility to conduct a consistent and thorough investigation, see OPM 10.1, "Occurrence Reporting and Processing of Significant Operations Information"	2) Investigation Responsibility None
Investigator Qualification a) Investigators should be knowledgeable with no vested interest or bias	Investigator Qualification a) BNL staff members from the ESHQ Directorate and other BNL technical experts are available to assist the C-AD subject matter experts in investigations. The Occurrence Reporting and Processing System (ORPs); Investigation of Incidents, Accidents and Injuries; and Critiques subject areas provide guidance for responsible investigators. This team approach helps ensure an unbiased investigation.	3) Investigator Qualification None
b) Investigators should be trained 4) Information to be Gathered a) Collect the following information as soon as possible:	b) Trained investigators are appointed to investigation committees 4) Information to be Gathered a) The initial actions by the Operations Coordinator or Supervisor are to take any actions necessary to make the area safe without endangering the health and safety of themselves or other personnel. The Occurrence Reporting and Processing System (ORPs); Investigation of Incidents, Accidents and Injuries; and Critiques Subject Areas detail these requirements. Initial information collection requirements include:	4) Information to be Gathered None
i) Initial condition of facilityii) Statements of operators and other personneliii) Logs and computer printouts	 i) A record of date and time of the event, date and time of all notifications and initial condition of the facility ii) A record based on operator statements regarding a step by step sequence of events leading to the incident if known. iii) Logs and computer printouts that are retrievable after an event. 	

DATE: 6/08/06

PAGE: 2 of 5

Manager. Can Include:(a) Changes in procedures

(b) Training

EXCEPTIONS GUIDELINE **PERFORMANCE** iv) Other pertinent documents iv) Pertinent documents that are preserved in logbooks or binders for future reference. 5) Event Investigation 5) Event Investigation **Event Investigation** a) Depending on their significance the format a) The standard methods in Occurrence Reporting and Processing System None. (ORPS); Investigation of Incidents, Accidents and Injuries; Critiques should include: and Corrective and Preventive Action Subject Areas are used. These standard methods include event reconstruction **Event Reconstruction** (1) Develop chronological list (2) Include list of personnel involved Event Analysis and Evaluation ii) These standard methods include event analysis and evaluation (1) Determine the response of equipment and personnel (2) Compare actual and expected responses (3) Determine adequacy of procedures and factors effecting performance (4) Compare event with prior events (5) Perform analysis to determine any detrimental effects that have occurred iii) Root-Cause Determination iii) These standard methods include root cause determination (1) Define casual factors that, if corrected, would preclude recurrence iv) These standard methods include corrective action. Responsibilities iv) Corrective Action Determination (1) Determine actions to implement the corrective actions are formally assigned and (2) Assign responsibility to implement approved by the Facility Manager, who is the C-AD Chair. The the corrective actions. corrective actions are entered into the BNL Action Tracking (3) Obtain final approval by Facility System (ATS)

DATE: 6/08/06

PAGE: 3 of 5

GUIDELINE	PERFORMANCE	EXCEPTIONS
(c) Design Modifications(d) Change in administrative controls		
6) Investigative Report a) Report should include: i) Description of the event ii) Impact of the event iii) Root causes of the event iv) Lessons learned from the event v) Proposed corrective actions vi) Any positive aspects of the event (correct actions taken or planned)	6) Investigative Report a) The C-AD uses the DOE ORPS reporting system and the requirements for Critiques in SBMS. Critiques are used for all events including those not meeting the ORPs thresholds for reporting to DOE. All corrective actions are tracked in the BNL or C-AD ATS. The format for reports follows requirements in the SBMS Subject Areas on Occurrences and Critiques. The ORPs form includes the topics listed in this Conduct of Operations guideline.	6) Investigative Report None
b) The report should have the appropriate reviews and approvals	 ORPs reports and critiques require appropriate reviews and sign-offs as indicated in the relevant subject areas 	
Provide a mechanism to train personnel on aspects of the event in a timely fashion	7) Event Training a) Corrective actions requiring training are tracked by the BNL or C-AD ATS and are closed out during the first available training evolution, if practical. For corrective actions requiring immediate implementation, changes to procedures and appropriate training are performed prior to restart of the effected facility. Department personnel are informed on events through event and/or facility specific training and weekly meetings with C-AD Divisions. Relevant "lessons Learned" information is provided to C-AD personnel via the C-AD and/or BNL Lessons Learned Coordinator.	7) Event Training None
8) Event Trending a) Track patterns of deficiencies, such as operator errors and inadequate procedures. Output Description:	8) Event Trending a) The C-AD trends events and occurrence reports as part of its Performance Indicator Program. Annually, events and occurrence report experience is reviewed with C-AD and BNL management at the Environmental Management, OSH management and Self Assessment Review.	8) Event Trending None

DATE: 6/08/06

PAGE: 4 of 5

GUIDELINE PERFORMANCE EXCEPTIONS Archival ORPS reports and critiques may be found at C-AD Critiques and b) Keep a summary of all events for review. C-AD ORPs Reports. ORPs reports are also maintained at the DOE website, Occurrence Reporting & Processing System (password required). 9) Sabotage 9) Sabotage Sabotage 9) Sabotage events are investigated by the BNL Safeguards and Security a) There should be an immediate investigation None a) Division who may be reached at 2222 or 911 for emergencies and 2238 for non-emergencies. C-AD supports the investigation to the extent i) Ensure operability of safety systems ii) Decide if facility should be shutdown requested by BNL Safeguards and Security Division and DOE. Minimize any impact of discovered Operators are trained to minimize the impacts of events including sabotage and determine future actions sabotage. BNL Safeguards and Security Division is notified of any suspected or actual sabotage event as soon as it is discovered.

DATE: 6/08/06 **PAGE:** 5 of 5